



Canadian Steering Committee on Numbering

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1 April 2004

TRANSMITTED ELECTRONICALLY

TO: Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth St., SW
Room TW-A325
Washington, DC 20554
USA

**Subject: NANPA Fund Administration CC Docket No. 92-237
Inclusion of NANPA Funds in FCC Financial Statements**

The Canadian Steering Committee on Numbering (CSCN) has recently become aware that the financial information of NANP Administration (NANPA) is included in the financial statements of the Federal Communications Commission (FCC).

The CSCN is also aware that the North American Billing and Collection, Inc. (NBANC) objects to the treatment of NANPA funds as part of the FCC's financial statements. In June 2003, NBANC submitted an extensive legal memorandum that demonstrated clearly how relevant federal accounting standards do not support inclusion of NANPA funds in the FCC's financial statements. Recently on 19 March 2004, Mary Retka, Chairperson of the NBANC, submitted a letter to you outlining NBANC's views on this matter.

The CSCN agrees with the views expressed by the NBANC on this matter. Specifically, it is irregular and inappropriate for funds that include international contributions to be treated as though they were U.S. government funds. These amounts are collected entirely from the private sector and are used solely to fund private sector functions. Furthermore, NANPA funds are collected from 19 countries, including Canada and the U.S. that participate in the NANP. Inclusion of domestic private sector and internationally generated funds in the FCC's budget is inappropriate and should be discontinued.

The CSCN respectfully suggests that the FCC consider the arguments presented by the NBANC and refrain from including NBANC funds in the FCC financial statements.

Sincerely,

Original signed by

Doug Birdwise
CSCN Chair

CC: Robert Atkinson, Chair North American Numbering Council (NANC)
Charles Dalfen, Chairperson Canadian Radio-television and Telecommunications
Commission (CRTC)
Mary Retka, Chairperson of North American Billing and Collection, Inc. (NBANC)
Parke Davis, President Canadian Numbering Administration Consortium (CNAC)